



Exhibit B

December 11, 2023

Via Email

dkolde@ifs.org

Endel Kolde, Esq.
Institute for Free Speech
1150 Connecticut Ave., NW, Ste. 801
Washington D.C. 20035

Re: Request for Information Pertaining to User Account: mcombsprof@yahoo.com
Richard Lowery v. Lillian Mills, et al., Case No. 1:23-cv-129-DAW
(Internal Reference No. 562738)

Dear Mr. Kolde:

Yahoo Inc. ("Yahoo") is in receipt of a subpoena dated November 6, 2023, in the above-referenced matter.

Based upon its interpretation of the subpoena and considerable experience with requests for user data, Yahoo took the subpoena to require and be satisfied by the production of the following enclosed information regarding the specified user account, for the time period specified, to the extent available from our system: (1) subscriber details; and (2) the dates, times, and Internet protocol addresses for logins and authentication events (if any). A declaration authenticating these records also is enclosed.

To the extent any document provided herein contained information that exceeded the scope of your request, is protected from disclosure, or is otherwise not subject to production, we have redacted or otherwise removed such information. When reviewing the information provided, please note that Yahoo may not require or verify user information because it offers many of its services to users for free.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lucy Arnaud", is written over a light blue circular background.

Lucy Arnaud, Sr. Legal Analyst
Yahoo Inc.
Legal Department

Enclosure

BUSINESS RECORDS DECLARATION

Request for information regarding:
mcombsprof@yahoo.com

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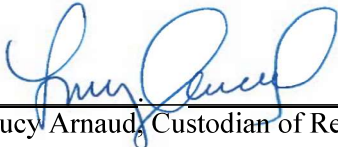
**DECLARATION OF
LUCY ARNAUD**

I, Lucy Arnaud, declare:

1. I am a Custodian of Records for Yahoo Inc. (“Yahoo”) located in San Jose, California. I am authorized to submit this declaration on behalf of Yahoo. I make this declaration pursuant to the Federal Rules of Evidence Rule 902(11) and the California Code of Evidence section 1561 and in response to a subpoena dated November 6, 2023 (“the request”). I have personal knowledge of the following facts, except as noted, and could testify competently thereto if called as a witness.
2. Attached hereto are true and correct copies of the following data in the custody of Yahoo pertaining to the relevant user account responsive to the request: (1) subscriber details; and (2) the dates, times, and Internet protocol addresses for logins and authentication events (if any). Yahoo’s servers record this data automatically at the time, or reasonably soon after, it is entered or transmitted, and this data is kept in the course of this regularly conducted activity and was made by regularly conducted activity as a regular practice. Yahoo may not require or verify user information because it offers many of its services to users for free.
3. To the extent any document attached hereto contained information that exceeded the scope of the request, is protected from disclosure, or is otherwise not subject to production, such information has been redacted or otherwise removed.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

DATED: December 11, 2023



Lucy Arnaud, Custodian of Records

Yahoo Account Management Tool

Login Name:	2meveh73kt23za3loaqqfzinpfdoubjpqm2icf3b
GUID:	BNECNY7TAKQUXUUIAQS2SQDGIY
Mail Name:	mccombsprof@yahoo.com
Alternate Communication Channels:	+15126940137 Verified
Registration IP Address:	2600:1700:100:3290:895b:b502:7cf8:c1d7
Account Created (reg):	Wed Jul 27 23:54:23 2022 GMT
Other Identities:	mccombsprof@yahoo.com mccombsprof 2meveh73kt23za3loaqqfzinpfdoubjpqm2icf3b
Full Name:	mccombs prof
Address1:	
Address2:	
City:	
State, territory or province:	
Country:	
Zip/Postal Code:	
Phone:	
Time Zone:	
Birthday:	
Gender:	
Occupation:	
Business Name:	
Business Address1:	
Business Address2:	
Business City:	
Business State:	
Business Country:	
Business Zip:	
Business Phone:	
Business Email:	
Additional IP Addresses:	
Account Status:	active

Login Activity Summary

This information is provided for intended and authorized use only. Any use of this data for unauthorized purposes is strictly prohibited.

Request Information

Target mcombsprof@yahoo.com
Start Date 1980-01-01 00:00:00
End Date 2023-11-06 23:59:59
Time Zone (UTC) Coordinated Universal Time

Login Activity

User ID	IP	Port	TimeStamp
mcombsprof	2600:1700:100:3290:c5e3:25b4:7e7e:436b	52028	September 03 2023 20:21:08
mcombsprof	2600:1700:100:3290:ad:9b06:dab9:8bce	55814	August 26 2023 16:47:07